

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FT. WORTH DIVISION**

ROBERT “BOB” ROSS	§	
Plaintiff/Counterclaim Defendant	§	
	§	Case No. 4:22-CV-00343-Y
	§	
	§	
ASSOCIATION OF	§	
PROFESSIONAL FLIGHT	§	
ATTENDANTS, MCGAUGHEY,	§	
REBER AND ASSOCIATES, INC.,	§	
JULIE HEDRICK, ERIK HARRIS	§	
	§	
Defendants/Counterclaim Plaintiff.	§	
	§	
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EUGENIO VARGAS	§	
Plaintiff/Counterclaim Defendant	§	
	§	Case No. 4:22-CV-00430-Y
	§	
	§	
ASSOCIATION OF	§	
PROFESSIONAL FLIGHT	§	
ATTENDANTS, JULIE HEDRICK,	§	
ERIK HARRIS	§	
Defendants/Counterclaim Plaintiff.	§	
	§	

AFFIDAVIT OF EUGENIO VARGAS IN SUPPORT OF JOINDER OF PARTIES

BEFORE ME, the undersigned authority, on this day personally appeared Eugenio Vargas, who being by me first duly sworn, did state:

1. “I am employed as a Flight Attendant working with American Airlines, Inc. and I served as the National Treasurer for the Association of Professional Flight Attendants (“APFA”), from April 1, 2016 to July 1, 2018. I have personal knowledge of the facts, I am 21 years or older and of sound mind to make these statements.

- a. During my administration of my duties as National Treasurer, it was my responsibility to review all incoming charges, expenses and receipts of the APFA National President. It was my responsibility to ensure compliance with LMRDA, to assist in the accounting, document maintenance, ensure proper LM-2 filings were timely and accurately made and filed with the U.S. Department of Labor.
- b. At that time I served with Robert “Bob” Ross (“Ross”) as the National President of APFA. As National Officers of APFA we were required to have and retain a surety bond for which we paid the union directly. The Surety Bond was issued as a rider on APFA’s regular insurance policy. I requested the insurance information from the APFA leadership in 2019, after I left office. No insurance documentation has ever been provided to me.
- c. I discovered an old communication from the insurance agent for APFA on April 4, 2023. The surety bond was issued by IMA Financial Group, Inc. This insurance company provides insurance coverage and surety bonds on all APFA National Officers as routine practice.
- d. I further recently discovered that all four National Officers received email documentation from Hal O’Neil including the Confidential Memo on October 22, 2020.
- e. Eric Harris, APFA National Treasurer, attended and testified at my Arbitration Hearing. Furthermore, all four National Officers were

present and voted at the Executive Committee validating the charges filed against me and sending the charges to an Article VII Union Disciplinary Arbitration Hearing.

f. As of the date of signing this Affidavit, none of the APFA National Officer provided the Confidential Memo to me.

FURTHER AFFIANT SAYETH NOT.

State of Texas
County of Harris



Eugenio Vargas

SWORN AND SUBSCRIBED TO before me on this 7th day of April, 2023.
This notarial act was an online notarization via two-way webcam and audiovisual technology.
Produced Texas Driver License as identification along with multi-factor KBA authentication.



Online Notary Public
Notary Public, State of Texas

